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STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

1315 W. 4th Avenue • Kennewick, Washington 99336-6018 • (509) 735-7581

February 5, 2003

Mr. Roy Schepens  
Office of River Protection  
United States Department of Energy  
P. O. Box 450, MSIN: H6-60  
Richland, Washington 99352

**RECEIVED**  
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**EDMC**

Mr. Edward S. Aromi, Jr.  
CH2M Hill Hanford Group, Inc.  
P.O. Box 1500, MSIN: H6-63  
Richland, Washington 99352

Dear Messrs. Schepens and Aromi:

Re: Failure to complete Corrective Measures per Notice of Non-Compliance for  
Deficient Leak Detection in Single-Shell Tank Farms

On July 23, 2002, the Washington State Department of Ecology (Ecology) conducted an inspection into the use and management of temporary (hose-in-hose) transfer lines by the United States Department of Energy-Office of River Protection (USDOE-ORP) and CH2M Hill Hanford Group Incorporated (CHG), at Hanford single-shell tank farms. This inspection revealed two violations of tank system regulatory requirements. On August 8, 2002, Ecology issued a notice of non-compliance which directed ORP and CHG to develop a management plan for correcting these violations. At ORP's request, submittal of the temporary transfer line management plan was extended until December 20, 2002.

Ecology reviewed the Temporary Waste Transfer Line Management Program Plan (RPP-12711) submitted by ORP on December 17, 2002. Ecology's review revealed the plan to be deficient in resolving the violations described in the August 8 Notice of Non-Compliance. Ecology then met with ORP and CHG representatives throughout January 2003, to develop an adequate management plan for use of temporary transfer lines in Hanford tank farms. These meetings resulted in agreements that, if completed as described below, will address the violations described in Ecology's August 8 Notice of Non-Compliance.

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Please be advised that failure to submit a revised temporary transfer lines management plan as described below may result in the issuance by Ecology of an administrative order and/or penalties per Revised Code of Washington (RCW) 70.105.080.

REVISION REQUIRED:

On or before March 31, 2003, ORP and CHG will submit for Ecology's approval, a revision to the Temporary Waste Transfer Line Management Program Plan (RPP-12711). In summary, this revision must address removal of liquids from secondary containment of temporary transfer lines in as timely a manner as practicable and include a description of the equipment and procedures required to perform this action. This revision must also provide waste minimization process, techniques and planning based on Resource Conservation and Recovery Act (RCRA) waste minimization guidance for disposal of temporary transfer lines as they are determined to be solid waste. Further detail describing the requirements for this revision to the Temporary Waste Transfer Line Management Program Plan are found in the attachment to this letter.

If you have any questions regarding this letter, please contact me at (509) 736-3031.

Sincerely,



Bob Wilson  
Compliance Specialist  
Nuclear Waste Program

BW:nc  
Attachment

cc/attachment: Phil Miller, CHG  
Deborah J Williams, ORP  
Ken Niles, OOE  
Administrative Record: TWRS

## COMMENT INCORPORATION INTO HIHTL MANAGEMENT

### Reference:

Letter, B. Wilson, Ecology, to R. J. Schepens, ORP, and E. S. Aromi, CHG, *Notice of Non-Compliance for Deficient Leak Detection in Single-Shell Tank Farms*, 0203589, dated August 8, 2002.

Comments discussed on January 15, 2002 with the Department of Ecology on the HIHTL management plan are accepted, and are being dispositioned in the following manner:

Revise RPP 12711, Temporary Waste Transfer Line Management Program Plan, to incorporate comments, and lessons learned during the draining of the failed S/SX line.

### REMOVAL OF ENCASEMENT LIQUIDS

- Include discussion on, and reference to RPP 14078 (failure evaluation).
- Specifically reference the successful work package as a proven "draft" for future draining activities.
- Address dewatering tool control by IS Operations.
- Use the staging of the dewatering tool, draft draining package, and lessons learned as a basis to be able to perform future draining activities in a time frame of weeks (TBD).
- Require the notification of the ECO (and subsequent regulator notifications) in the event an encasement draining will be postponed or delayed beyond the timeframe laid out by the plan.

### WASTE MINIMIZATION

- Provide reference to "LDR" process (Input provided by CHG ECO).
- Provide specific waste minimization techniques (meeting tomorrow to discuss).
- Commit to include the Waste group in planning efforts at the time of disposal.

These items will be included as an appendix to the existing management plan.

Completion of these items will be accomplished by February 27. Major activities are to hold the meeting, draft the changes, incorporate comments and prepare a transmittal to ORP, with a draft letter to Ecology.